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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

MAR 29 2002

REPLY TO THE ATTENTION OF

Downers Grove Groundwater Site

PROMPT REPLY NECESSARY  
CERTIFIED MAIL: RETURN RECEIPT REQUESTED

Magnatrol International  
5300 Belmont Road  
Downers Grove, IL 60515

Re: Request for Information Pursuant to Section 104 of CERCLA  
for the Downers Grove Groundwater Site in Downers Grove,  
DuPage County, Illinois

Dear Sir or Madam:

This letter seeks your cooperation in providing information and documents relating to the contamination of the the Downers Grove Groundwater Site in Downers Grove, DuPage County, Illinois ("Site"). A Superfund site is a site contaminated with high levels of hazardous substances that may present a threat to human health or the environment.

We encourage you to give this matter your immediate attention and request that you provide a complete and truthful response to this Information Request and attached questions (Attachment B) within twenty-one (21) days of your receipt of this letter.

The United States Environmental Protection Agency ("U.S. EPA") is investigating the release or threat of release of hazardous substances, pollutants, or contaminants at the Site. U.S. EPA is seeking to obtain information concerning the generation, storage, treatment, transportation, and methods used to dispose of such substances that have been, or threaten to be, released from the Site. U.S. EPA will study the effects of these substances on the environment and public health. In addition, U.S. EPA will identify activities, materials, and parties that contributed to contamination at the Site. U.S. EPA believes that you might have information which may assist the Agency in its investigation of the Site.

The U.S. EPA is currently investigating the source of a contaminated groundwater plume in Downers Grove, Illinois. Water samples taken from several private wells have tested above the

maximum contaminant level (MCL) of 5 parts per billion for trichloroethylene (TCE) & tetrachloroethylene (PCE). The source or sources of the plume are believed to originate in the Ellsworth Industrial Park which is bounded by the BNSF railroad tracks (approximately 5000 south) to the north, Belmont Road (2200 west) on the east, Maple Avenue (approximately 2900 west) on the west and 63<sup>rd</sup> Street to the south.

#### Description of Legal Authority

The federal "Superfund" law (the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. §9601, et seq., commonly referred to as "CERCLA" and "Superfund") gives U.S. EPA the authority to, among other things: (1) assess contaminated sites, (2) determine the threats to human health and the environment posed by each site, and (3) clean up those sites in the order of the relative threats posed by each.

#### Information Request

Under Section 104(e)(2) of CERCLA, 42 U.S.C. §9604(e)(2), U.S. EPA has broad information gathering authority which allows U.S. EPA to require persons to furnish information or documents relating to:

(A) The identification, nature, and quantity of materials which have been or are generated, treated, stored, or disposed of at a vessel or facility or transported to a vessel or facility.

(B) The nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at or from a vessel or facility.

(C) Information relating to the ability of a person to pay for or to perform a cleanup.

While U.S. EPA seeks your cooperation in this investigation, compliance with the Information Request is required by law. Please note that false, fictitious, or fraudulent statements or representations may subject you to civil or criminal penalties under federal law.

Some of the information U.S. EPA is requesting may be considered by you to be confidential. Please be aware that you may not withhold the information upon that basis. If you wish U.S. EPA to treat the information confidentially, you must advise U.S. EPA of that fact by following the procedures outlined in Attachment

A, including the requirement for supporting your claim for confidentiality.

If you have information about other parties who may have information which may assist the Agency in its investigation of the Site or may be responsible for the contamination at the Site, that information should be submitted within the time frame noted above.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1995, 44 U.S.C. §3501 et seq.

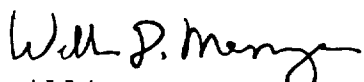
Instructions on how to respond to the questions in Attachment B to this document are described in Attachment A. Your response to this Information Request should be mailed to:

U.S. Environmental Protection Agency  
Carol Ropski  
Emergency Enforcement & Support Section, SE-5J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

If you have additional questions about the history of the Site, the nature of the environmental conditions at the Site, or the status of cleanup activities, please contact Steven Faryan at (312) 353-9351. However, if you have specific questions about the Information Request, please contact Carol Ropski at (312) 353-7647. Legal questions should be addressed to Thomas Krueger at (312) 886-0562.

We appreciate and look forward to your prompt response to this Information Request.

Sincerely,



William D. Messenger, Chief  
Emergency Enforcement and Support Section

Enclosures

cc: Kendra Pohn, Illinois Attorney General Office  
Tom Crause, Illinois Environmental Protection Agency

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E.O.  
3-1-00

bcc: Tom Krueger, ORC (C-14J)  
Steve Faryan, (SE-5J) or (SE-GI) or (5-SEDO)  
John Maritote, EESS (SE-5J)  
Carol Ropski, EESS (SE-5J)  
Denise Battaglia, Public Affairs, (P-19J)  
Records Center (SMR-7J)  
ERB Read File

Sara Habert SAIC

Attachment A  
Information Request

Instructions

1. Answer Every Question Completely. A separate response must be made to each of the questions set forth in this Information Request. For each question contained in this letter, if information responsive to this Information Request is not in your possession, custody, or control, please identify the person(s) from whom such information may be obtained.
2. Number Each Answer. Precede each answer with the corresponding number of the question and the subpart to which it responds.
3. Provide the Best Information Available. Provide responses to the best of Respondent's ability, even if the information sought was never put down in writing or if the written documents are no longer available. You should seek out responsive information from current and former employees/agents. Submission of cursory responses when other responsive information is available to the Respondent will be considered non-compliance with this Information Request.
4. Identify Sources of Answer. For each question, identify (see Definitions) all the persons and documents that you relied on in producing your answer.
5. Continuing Obligation to Provide/Correct Information. If additional information or documents responsive to this Request become known or available to you after you respond to this Request, U.S. EPA hereby requests pursuant to Section 104(e) of CERCLA that you supplement your response to U.S. EPA.
6. Confidential Information. The information requested herein must be provided even though you may contend that it includes confidential information or trade secrets. You may assert a confidentiality claim covering part or all of the information requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. §§9604(e)(7)(E) and (F), and Section 3007(b) of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. §6927(b), and 40 C.F.R. §2.203(b).

If you make a claim of confidentiality for any of the information you submit to U.S. EPA, you must prove that claim.

For each document or response you claim confidential, you must separately address the following points:

1. the portions of the information alleged to be entitled to confidential treatment;
2. the period of time for which confidential treatment is desired (e.g., until a certain date, until the occurrence of a specific event, or permanently);
3. measures taken by you to guard against the undesired disclosure of the information to others;
4. the extent to which the information has been disclosed to others; and the precautions taken in connection therewith;
5. pertinent confidentiality determinations, if any, by U.S. EPA or other federal agencies, and a copy of any such determinations or reference to them, if available; and
6. whether you assert that disclosure of the information would likely result in substantial harmful effects on your business' competitive position, and if so, what those harmful effects would be, why they should be viewed as substantial, and an explanation of the causal relationship between disclosure and such harmful effects.

To make a confidentiality claim, please stamp or type "confidential" on all confidential responses and any related confidential documents. Confidential portions of otherwise nonconfidential documents should be clearly identified. You should indicate a date, if any, after which the information need no longer be treated as confidential. Please submit your response so that all non-confidential information, including any redacted versions of documents, is in one envelope and all materials for which you desire confidential treatment are in another envelope.

All confidentiality claims are subject to U.S. EPA verification. It is important that you satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, and that it is not and has not been obtainable by legitimate means without your consent. Information covered by such claim will be disclosed by U.S. EPA only to the extent permitted by Section 104(e) of CERCLA. If no such claim accompanies the information

when it is received by U.S. EPA, then it may be made available to the public by U.S. EPA without further notice to you.

7. Disclosure to U.S. EPA Contractor. Information which you submit in response to this Information Request may be disclosed by U.S. EPA to authorized representatives of the United States, pursuant to 40 C.F.R. §2.310(h), even if you assert that all or part of it is confidential business information. Please be advised that U.S. EPA may disclose all responses to this Information Request to one or more of its private contractors for the purpose of organizing and/or analyzing the information contained in the responses to this Information Request. If you are submitting information which you assert is entitled to treatment as confidential business information, you may comment on this intended disclosure within fourteen (14) days of receiving this Information Request.

8. Personal Privacy Information. Personnel and medical files, and similar files, the disclosure of which to the general public may constitute an invasion of privacy, should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."

9. Objections to Questions. If you have objections to some or all the questions within the Information Request letter, you are still required to respond to each of the questions.

### Definitions

The following definitions shall apply to the following words as they appear in this Information Request.

1. The term "**arrangement**" means every separate contract or other agreement between two or more persons, whether written or oral.

2. The term "**documents**" includes any written, recorded, computer-generated, or visually or aurally reproduced material of any kind in any medium in your possession, custody, or control, or known by you to exist, including originals, all prior drafts, and all non-identical copies.

3. The term "**hazardous substance**" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances. The term

**"hazardous substance"** shall include all chlorinated solvents and chlorinated solvent mixtures.

4. The term **"identify"** means, with respect to a natural person, to set forth: (a) the person's full name; (b) present or last known business and home addresses and telephone numbers; (c) present or last known employer (include full name and address) with title, position or business.

5. With respect to a corporation, partnership, or other business entity (including a sole proprietorship), the term **"identify"** means to provide its full name, address, and affiliation with the individual and/or company to whom/which this request is addressed.

6. The term **"material"** or **"materials"** shall mean any and all objects, goods, substances, or matter of any kind, including but not limited to wastes.

7. The term **"person"** shall include any individual, firm, unincorporated association, partnership, corporation, trust, or other entity.

8. The term **"pollutant or contaminant"** shall include, but not be limited to, any element, substance, compound, or mixture, including disease-causing agents, which after release into the environment will or may reasonably be anticipated to cause death, disease, behavioral abnormalities, cancer, genetic mutation, physiological malfunctions (including malfunctions in reproduction) or physical deformations; except that the term **"pollutant or contaminant"** shall not include petroleum.

9. The term **"real estate"** shall mean and include, but not be limited to the following: land, buildings, a house, dwelling place, condominium, cooperative apartment, office or commercial building, including those located outside the United States.

10. The term **"release"** shall mean any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.

11. The term **"Site"** shall mean the Downers Grove Groundwater Superfund Site which is a groundwater contamination plume believed to originate from releases in the Ellsworth Industrial

Park, which is bounded by the BNSF railroad tracks (approximately 5000 south) to the north, Belmont Road (2200 west) on the east, Maple Avenue (approximately 2900 west) on the west and 63<sup>rd</sup> Street to the south, in Downers Grove, DuPage County, Illinois.

12. The term "**waste**" or "**wastes**" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.

13. The term "**you**" or "**Respondent**" shall mean the entity that this Information Request was addressed to. The term "you" also includes any officer, managers, employees, contractors, trustees, successors, assigns, and agents of Respondent.

14. The term "**solvent**" shall include all of the solvents listed in Attachment C by their generic and trade names.

Attachment B  
Requests

1. **Identify** all **persons** consulted in the preparation of the answers to these Information Requests.
2. Identify all **documents** consulted, examined, or referred to in the preparation of the answers to these Requests, and provide copies of all such documents.
3. If **you** have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such persons.
4. Have **you** conducted any Phase I or Phase II investigations at your property? If so, please send copies of all reports including the analytical data.
5. Are there any monitoring wells on your property? If so, provide a map and the analytical results of the samples that were collected. Identify the entity that installed the monitoring wells and the date(s) of the well installation..
6. Have any soil borings been collected on your property? If so, send a map and analytical results related to the borings that were collected. Identify the entity that performed the soil borings and the date(s) in which they were taken.
7. Have there ever been above ground or below ground storage tanks at your facility? If so, provide maps of the locations of the tanks. What was stored in each tank? If the tanks have been removed or replaced provide the date(s) of their removal or replacement. Provide copies of any analytical results of the contents of the tanks and analytical results of any samples taken of the soil surrounding or below the tanks.
8. Describe your company's solvent management system (including locations of your product and waste holding tanks, drums and containers) at your facility prior to 1980.
9. Describe your company's waste solvent handling and disposal practices prior to 1980.

10. Provide the names of your solvent suppliers, years of service, and quantities of solvents received since you have been at this location.
11. Provide the names of your waste solvent handlers, years of service, and quantities of waste shipped since you have been in service at this location.
12. Provide drawings or diagrams of your sanitary and storm water sewer system at your facility.
13. Provide a copy of all correspondence between yourself and each unit of local government regarding discharges into St. Joseph Creek and the municipal sewer.
14. Describe the function of any floor drains at the facility. Provide a map of each floor drain location. Describe where the floor drains and associated piping drain to.

**List of Most Commonly Used Chlorinated Solvents and Their Breakdown Products**

Chemical Name	CAS No.	Synonyms
Tetrachloroethylene	127-18-4	1,1,2,2-Tetrachloroethylene
		Perclene d
		Ankilostin
		Perclene
		Antisol 1
		Percosolve
		Carbon dichloride
		PERK
		Didakene
		Perklone
		Dowper
		Persec
		Ethylene tetrachloride
		Tetlen
		Fedal-un
		Tetracap
		ISOFORM
		Tetrachloroethene
		Tetrachloroethylene
		Nema
		Tetrachloroethylene
		PCE
		Tetraleno
		PER
		Tetralex
		Perawin
		Tetravec
		PERC
		Tetrochloroethane
		Perchlor
		Tetroguer
		Perchloroethylene
		Tetropil

Chemical Name	CAS No.	Synonyms
Trichloroethylene	79-01-6	1,1,2-trichloroethene
		Ethylene trichloride
		Triol
		1,1,2-Trichloroethylene
		Fleck-flip
		Triasol
		1,1-dichloro-2-chloroethylene
		Flock flip
		Trichloran
		1,2,2-trichloroethylene
		Fluate
		Trichlorathane
		1-chloro-2,2-dichloroethylene
		Gemalgene
		Trichloren
		Acetylene trichloride
		Germalgene
		Trichloroethene
		Algylen
		Lanadin
		Trichloroethylene (TCE)
		Anamenth
		Lethurin
		Triciene
		Benzinol
		Narcogen
		Tri-Clene
		Blacosolv
		Narkogen
		Trielene
		Blancosolv
		Narkosoid
		Trieline
		Cecolene
		Nialk
		Triklone
		Chlorilen
		Perm-a-chlor
		Trilene
		Chlorylea
		Perm-a-clor
		Triline
		Chlorylen
		Petzinol
		Trimar
		Chorylen
		Philex
		Triol
		Circosolv
		TCE
		Tri-plus
		Crawhaspol
		Threthylene
		Tri-plus m
		Densinfluat
		Trethylene
		Vestrol
		Dow-tri
		Tri
		Vitran
		Dukeron
		Triad
		Westrosol
		Ethynyl trichloride

**List of Most Commonly Used Chlorinated Solvents and Their Breakdown Products**

Chemical Name	CAS No.	Synonyms
Methylene Chloride	75-09-2	Aerotherne MM DCM Dichloromethane Freon 30 Methane dichloride METHYLENE CHLORIDE (DICHLOROMETHANE) Methylene chloride Methylene dichloride Narkotil Plastisolve R 30 Refrigerant 30 Solaesthin Solmethine

Chemical Name	CAS No.	Synonyms
1,1,1-Trichloroethane	71-55-6	1,1,1- 1,1,1-tce aerotherne tt 1,1,1-TRICHLOROETHANE (METHYL CHLOROFORM) 1,1-Trichloroethane Alpha-trichloroethane Chlorothene NU Chlorothene VG Chlorothene Methyl Chloroform Methyltrichloromethane Solvent 111 Trichloroethane, Tri-ethane

Chemical Name	CAS No.	Synonyms
Carbon Tetrachloride	56-23-5	Benzinoform Carbon chloride Carbon tet Carbon tetrachloride Carbona Flukoids Freon 10 Halon 104 Methane tetrachloride Necatorina Necatorine Perchloromethane r 10 (refrigerant) R 10 Refrigerant R10 Tetrachlorocarbon Tetrachloromethane Tetrafinol Tetraform Tetrasol Univerm Vermoesticid

Chemical Name	CAS No.	Synonyms
Vinyl Chloride	75-01-4	Chloroethene Chloroethylene Ethylene monochloride Monochloroethene Monochloroethylene VC VCM Vinyl C Vinyl Chloride

Chemical Name	CAS No.	Synonyms
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**List of Most Commonly Used Chlorinated Solvents and Their Breakdown Products**

1,1-Dichloroethylene	75-35-4	1,1-DCE 1,1-Dichloroethene 1,1-dichloroethylene Asym-dichloroethylene Sconatex VDC Vinylidene Chloride Vinylidene chloride(II) Vinylidene dichloride
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Chemical Name	CAS No.	Synonyms
Chloroform	67-66-3	Chloroform Chloroform Formyl trichloride Methane trichloride Methenyl trichloride Methyl trichloride
		R 20 r 20 (refrigerant) Refrigerant R20 Trichloroform Trichloromethane